WASHINGTON STATE DEPARTMENT OF TRANSPORTATION CLALLAM COUNTY CITIZEN CONCERNS – ROADSIDE HERBICIDE USE

Beginning in the summer of 2002, some citizens in Clallam County expressed several concerns to WSDOT about roadside herbicide use. These concerns have been considered in the development of a new Integrated Vegetation Management (IVM) plan for highways in Clallam County. The various concerns expressed by citizens and how the WSDOT IVM plan addresses these concerns is explained below:

- 1. Concern that blackberries had been sprayed and people were picking, eating, and/or selling herbicide-contaminated berries. Citizens requested posting areas where blackberries were sprayed to notify people. Response: Herbicides will not be applied to blackberry plants until fall (and only on an as-needed basis); well after any berries are present on the vine. If in the course of a noxious weed or gravel road shoulder herbicide treatment, some overspray affects blackberries, WSDOT will post a sign on the roadside indicating this.
- 2. Concern that a recent federal court ruling judged that WSDOT use of herbicides was detrimental to salmon. Response: WSDOT's interpretation of the ruling is that it is not a finding of harm to salmon; rather it ruled that there is enough evidence for certain herbicides that EPA must consult with NMFS as to effects of herbicide applications on salmon. Nonetheless, WSDOT is voluntarily implementing a 20 yard buffer guideline as outlined by the Washington Toxics Coalition and others in a request for court injunction for most herbicide applications in environmentally sensitive areas.
- 3. Concern that WSDOT herbicide applicators were inadequately trained. Response: WSDOT applicators continue to be trained in general conditions of herbicide application to retain certification from Dept. of Agriculture. Last year there was a less-specific plan for vegetation management on highways in Clallam County, relative to the 2003 IVM plan. This year's more detailed plan will provide more precise direction for vegetation management actions. Applicators have participated in the development of this plan. They will be trained as to how to implement the plan and we will be closely monitoring implementation of the plan. We also encourage constructive communication from citizens if anybody sees activity that does not seem consistent with the plan
- 4. Concern that volunteer litter pickers might be unknowingly picking litter in areas with freshly applied herbicides. Response: IVM plan will reduce amounts of herbicides used and the resultant chance of volunteer exposure to freshly applied herbicides. Additionally, Adopt-a-Highway (AAH) groups are required to notify WSDOT before they conduct litter pick-up activities. When WSDOT is notified by the AAH groups, we will in turn notify volunteers of herbicide application schedules and information posted on our website and in local newspapers so they are aware of these activities.

- 5. Concern for schoolchildren walking on roadsides in school zones or waiting for the schoolbus where herbicides have been recently applied. Response: WSDOT will not apply gravel shoulder herbicides in locations along state highways that are posted school zones (i.e. Joyce and Clallam Bay schools). WSDOT is also communicating with school officials regarding school bus stops so due caution can be utilized with herbicide applications.
- 6. Concern that noxious weed infestations were not adequately treated (i.e. only partially sprayed with herbicides). Response: Increased focus on precision and selective applications will mean when herbicides are applied to noxious weeds, it will be done more with backpack sprayer or hose/reel sprayer resulting in effective coverage. Less time spent spraying directly from truck mounted nozzle.
- 7. Concern over spraying herbicides either directly in water or in environmentally sensitive areas. Response: The IVM plan dramatically reduces herbicide applications in environmentally sensitive areas (near water). It also directs non-herbicide treatments if the possibility exists of herbicide overspray entering water. A direct application of herbicides into streams or rivers is a clear violation of environmental laws and is indicated on herbicide labels.